

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION

---

SANDRA KLOC,

Plaintiff,

Case No.: 2021cv

v.

NATIONAL ENTERPRISE SYSTEMS, INC.,

Defendant.

---

**NOTICE OF REMOVAL**

---

**PLEASE TAKE NOTICE** that defendant, National Enterprise Systems, Inc. (hereinafter, "NES"), hereby removes this action from the State of Wisconsin Circuit Court for Milwaukee County to the United States District Court for the Eastern District of Wisconsin pursuant to 28 U.S.C. §§1331 (federal question), 1441 and 1446, and as and for its short, plain statement of the grounds for removal, respectfully states and alleges as follows:

1. On 3<sup>rd</sup> day of November, 2020, Plaintiff Sandra Kloc ("Kloc"), commenced an action against Defendant NES in the Circuit Court for the State of Wisconsin – Milwaukee County, captioned ***Sandra Kloc v. National Enterprise Systems, Inc.***, Case No. 20-cv-6511, by filing a Summons and Complaint with the Milwaukee County Clerk of Court, a true and correct copy of which is attached hereto as Exhibit 1.

2. On January 11, 2021, Defendant NES was served with the complaint within the meaning of 28 U.S.C. § 1446(b). The time within which Defendant NES is required to file a responsive pleading has not yet expired. No further proceedings have been had in this action. See Exhibit 1.

3. The complaint filed by Kloc, Exhibit 1, is a civil action of which this court has original jurisdiction pursuant to 28 U.S.C. § 1331 (federal question), in that it sets forth a claim for alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq (“FDCPA”). Exhibit 1, p. 6-8, 10-11.

4. Removal is timely under 28 U.S.C. § 1446(b) as the Complaint was filed on November 3, 2020 and Defendant was served on January 11, 2021.

5. In accordance with 28 U.S.C. § 1446(d), written notice of removal is being provided to the plaintiff and filed with the Clerk of the Circuit Court for Milwaukee County.

Dated this 9<sup>th</sup> day of February, 2021.

/s/ Alyssa A. Johnson

---

Alyssa A. Johnson, State Bar No. 1086085  
Attorneys for Defendant National Enterprise  
Systems, Inc.

**HINSHAW & CULBERTSON LLP**  
100 E. Wisconsin Avenue, Suite 2600  
Milwaukee, WI 53202  
Phone No. 414-276-6464  
Fax No. 414-276-9220  
E-mail Address(es):  
ajohnson@hinshawlaw.com